

EXHIBIT B

Dell employees located in Round Rock. All personnel files for its "business sales representatives" employed at any Dell call center are maintained only in hard copy form in Austin, Texas.

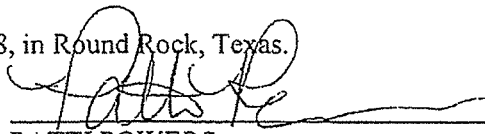
4. Dell maintains time records for "business sales representatives" using the KRONOS system. The KRONOS system is administered out Round Rock. Dell's Global Finance System Group is responsible for configuring the KRONOS system. All of the employees responsible for this are employed in Round Rock. These employees report to members of management in the Finance Department who are all located in Round Rock. All KRONOS records are located in the Austin/Round Rock area.
5. The following chart shows where Dell Marketing USA L.P. has employed "business sales representatives" during the time periods indicated:

	NUMBER OF DELL MARKETING USA L.P. BUSINESS SALES REPRESENTATIVES LISTED BY LOCATION			
	<u>TEXAS</u>	<u>OKLAHOMA</u>	<u>OTHER</u>	<u>TOTAL</u>
Currently employed (as of 08/01/08)	1,668	545	852	3,065
Employed 12/14/04 to 08/01/08	3,802	1,787	2,129	7,718

6. "Business sales representatives" are employed by Dell Marketing USA L.P. in its Americas Business Unit. Management of "business sales representatives" include 11 Vice Presidents, 9 of which are located in Round Rock; 8 Directors, 7 of which are employed in Round Rock; and approximately 260 people managers, 140 of which are employed in Round Rock. No Vice Presidents and only one sales Director are located in Oklahoma City.
7. One of the current opt-in Plaintiffs in the *Gandhi, et al* lawsuit which is pending in the United States District Court for the Western District of Texas, Austin Division, is Jamey Mendenhall. Jamey Mendenhall was employed by Dell Marketing USA L.P. as a business sales representative from September 13, 2004, to July 5, 2005, at Dell's call center in Oklahoma City.

Pursuant to 28 U.S.C. 1746, I affirm under penalty of perjury that the foregoing is true and correct.

EXECUTED on August 21, 2008, in Round Rock, Texas.


PATTI POWERS